

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE PUDA COAL SECURITIES INC.
ET AL. LITIGATION**

Case No: 1:11-CV-2598 (DLC)

CLASS ACTION

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT WITH
MOORE STEPHENS, P.C. AND DISTRIBUTION OF SETTLEMENT PROCEEDS**

Lead Plaintiffs Salomon Querub, Howard Pritchard, and Hotel Ventures LLC, and named plaintiffs Trellus Management Company LLC and Steven Weissmann (“Plaintiffs”) hereby move this Court for entry of Orders: (a) finally approving the Settlement with Defendant Moore Stephens, P.C. (“MSPC”); (b) approving distribution of the MSPC settlement proceeds and (c) entering default judgment against Puda and Ming Zhao. This motion is based on this Notice of Motion, the supporting Memorandum of Points and Authorities; the Declaration of Laurence Rosen and exhibits thereto, and the [Proposed] Orders and [Proposed] Judgments submitted concurrently herewith, and all pleadings, records and papers on file herein.

Dated: April 10, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of April 2017, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's service list.

/s/ Sara E. Fuks
Sara E. Fuks